

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

v.

TIMMY HUNT,

Defendants.

Case No. 20-CR-10119-DJC

DEFENDANT TIMMY E. HUNT'S MOTION TO SUPPRESS

Defendant Timmy E. Hunt hereby respectfully moves, pursuant to Federal Rule of Criminal Procedure 12(b)(3)(C) and the Fourth Amendment of the United States Constitution, to suppress all Global Positioning System data that the government searched and seized without a warrant from an electronic monitoring device that Mr. Hunt wore as a condition of his pre-trial release on state charges, and all fruits thereof. In support of this motion to suppress, Mr. Hunt is simultaneously filing a supporting Memorandum of Law and the Declarations of Timothy E. Hunt and John J. Falvey, Jr.

Respectfully Submitted,

Dated: May 7, 2021

/s/ John J. Falvey, Jr.

John J. Falvey, Jr. (BBO #542674)

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LOCAL RULE 7.1(a)(2) CERTIFICATION

I, John J. Falvey, Jr., hereby certify that I have conferred in good faith with the Government through Assistant U.S. Attorney Elianna Nuzum regarding the above-captioned motion and the parties have not been able to resolve the issues raised.

/s/ John J. Falvey, Jr.

John J. Falvey, Jr.

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 7, 2021.

Date: May 7, 2021

/s/ John J. Falvey, Jr.

John J. Falvey, Jr.